

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,

*Plaintiff,*

v.

DONALD J. TRUMP, in his personal capacity,

*Defendant.*

Civil Action No.: 1:20-cv-7311-LAK-JLC

**NOTICE OF MOTION TO STAY**  
**PENDING APPEAL**

**PLEASE TAKE NOTICE** that the defendant, Donald J. Trump (“Defendant”), hereby moves this Court, before the Honorable Lewis A. Kaplan, United States District Judge for the Southern District of New York, located at 500 Pearl Street, New York, NY 10007, on a date to be set by the Court, for an order granting Defendant’s motion to stay this case pending resolution of his appeal of this Court’s July 5, 2023 Order (ECF No. 173) under Rule 8(a)(1)(A) of the Federal Rules of Appellate Procedure.

This motion is supported by the annexed memorandum of law, any arguments or evidence presented in reply, and all arguments or evidence presented at a hearing or with leave of Court.

Dated: New York, New York  
July 27, 2023

Respectfully submitted,



Michael T. Madaio, Esq.  
HABBA MADAIO & ASSOCIATES LLP  
1430 U.S. Highway 206, Suite 240  
Bedminster, New Jersey 07921

-and-

112 West 34th Street, 17th & 18th Floors  
New York, New York 10120  
Telephone: (908) 869-1188  
Facsimile: (908) 450-1881  
E-mail: mmadaio@habbalaw.com  
*Attorneys for Defendant, Donald J. Trump*